

# Exhibit G

Chief Magistrate Judge Theresa L. Fricke

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DILBAG SINGH,

Petitioner,

v.

KRISTI NOEM, *et al.*,<sup>1</sup>

Respondents.

Case No. 2:26-cv-00402-TLF

FEDERAL RESPONDENTS’  
NOTICE OF CORRECTION

Federal Respondents respectfully notify the Court that a limited correction is required to their Return Memorandum (Dkt. 6) and the accompanying Declaration (Dkt. 7). The Return Memorandum and Declaration stated that the decision to detain Petitioner was reported to the court in *Garcia Ramirez v. U.S. Immigration and Customs Enforcement*, 310 F. Supp. 3d 7, 13 (D.D.C. 2018), through ICE’s December report in that matter. The filing and declaration further stated that no objection had been raised by class counsel regarding Petitioner’s return to custody.

After those filings were submitted, and after the Court entered judgment granting the habeas petition on March 12, 2026, counsel for the Office of Immigration Litigation (“OIL”)

<sup>1</sup> Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney’s Office.

1 informed undersigned counsel on March 13, 2026, that class counsel in *Garcia Ramirez* had  
2 contacted OIL on February 6, 2026, regarding Petitioner Singh’s re-detention and had requested  
3 additional information concerning the basis for that determination. *See* Declaration of Alixandria  
4 K. Morris. That communication was not reflected in the original filing or declaration.

5 The sequence of events is as follows: the present habeas petition was filed on February 4,  
6 2026; class counsel in *Garcia Ramirez* contacted OIL regarding concerns and questions with  
7 Petitioner’s re-detention from the December report on February 6, 2026; and that communication  
8 was subsequently relayed to ICE. In light of the timing of these events and the parallel litigation  
9 activity, the February 6, 2026 communication was not included in the previously filed materials.

10 This correction does not affect the disposition of this matter. On March 12, 2026, the Court  
11 granted the relief sought in the habeas petition and ordered Petitioner’s release. *See* Dkts. 10-11.  
12 Federal Respondents submit this notice solely to correct the record and ensure that it accurately  
13 reflects the relevant communications.

14 DATED this 19th day of March, 2026.

15 Respectfully submitted,

16  
17 *s/ Alixandria K. Morris*  
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22 *Attorney for Federal Respondents*

Chief Magistrate Judge Theresa L. Fricke

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DECLARATION OF  
ALIXANDRIA K. MORRIS

I, Alixandria K. Morris, hereby declare as follows:

1. I am an Assistant United States Attorney for the Western District of Washington and represent the Federal Respondents in the above-captioned case.

2. On March 13, 2026, Office of Immigration Litigation (“OIL”) at the Civil Division of the Department of Justice counsel Daniel Shutrum-Boward, assigned to handle case *Garcia Ramirez v. U.S. Immigration & Customs Enforcement*, 310 F. Supp. 3d 7, 13 (D.D.C. 2018) informed me that (1) the December report was provided to class counsel, not the Court (as there is no requirement to provide the monthly reports to the Court); and (2) class counsel raised concerns regarding Petitioner Singh’s re-detention to OIL on February 6, 2026 and asked for additional information on the reasons for re-detention.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 19th day of March, 2026.

s/ Alexandria K. Morris  
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